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9 **UNITED STATES DISTRICT COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**

11
12 VERICOOL WORLD LLC,

13 Plaintiff,

14 v.

15 IGLOO PRODUCTS CORPORATION,

16 Defendant.

Case No. 4:22-cv-02440-HSG

**JOINT STIPULATION AND ORDER TO
EXTEND DEADLINES FOR:
DEFENDANT TO FILE MOTION FOR
ATTORNEYS' FEES AND BILL OF
COSTS; AND PLAINTIFF TO FILE
NOTICE OF APPEAL**

17 Judge: Hon. Haywood S. Gilliam, Jr.
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1 Plaintiff Vericool World LLC (“Plaintiff”) and Defendant Igloo Products Corporation
2 (“Defendant”), by and through their respective attorneys of record, stipulate as follows:

3 WHEREAS, on December 13, 2023, the Court granted Defendant’s motion for summary
4 judgment on all of Plaintiff’s causes of action. Dkt. No. 60 (“MSJ Order”).

5 WHEREAS, on December 13, 2023, the Clerk of Court entered Judgment in favor of
6 Defendant consistent with the Court’s MSJ Order. Dkt. No. 61.

7 WHEREAS, pursuant to L.R. 54-5(a) and Federal Rule of Civil Procedure 54(d)(2)(B),
8 Defendant has until December 27, 2023 (14 days from entry of Judgment) to file a motion for
9 attorneys’ fees.

10 WHEREAS, pursuant to L.R. 54-1(a), Defendant has until December 27, 2023 (14 days
11 from entry of Judgment) to file its bill of costs.

12 WHEREAS, pursuant to Fed. R. App. P. 4(a)(1)(A), the deadline for Plaintiff to file a notice
13 of appeal is January 12, 2024, but that deadline may be extended by 30 days (February 11, 2024)
14 by motion under Fed. R. App. P. 4(a)(5)(A), and the parties hereby jointly move and stipulate for
15 the 30-day extension to February 11, 2024.

16 WHEREAS, pursuant to L.R. 54-5(a), the parties met and conferred concerning
17 Defendant’s requests for attorneys’ fees and costs, and potential resolution of the underlying action.

18 WHEREAS, the parties agree that an extension of 30 days (*i.e.*, until January 26, 2024) for
19 Defendant to file a motion for attorneys’ fees and bill of costs and that an extension of 30 days (*i.e.*,
20 until February 11, 2024) for Plaintiff to file a notice of appeal are necessary so that Defendant can
21 compile and prepare the relevant records, Plaintiff has time to review Defendant’s requests for fees
22 and costs, the parties can attempt to resolve or narrow the issues without court intervention, and the
23 parties can potentially discuss resolution of the underlying action.

24 WHEREAS, this is the first request for the extensions requested herein, and because
25 Judgment has already been entered for Defendant, the requested extensions would have no effect
26 on the schedule for the case.

27 THEREFORE, the parties hereby agree and stipulate as follows:

28 The deadline for Defendant to file a motion for attorneys’ fees and bill of costs, currently

1 set for December 27, 2023, shall be extended by 30 days to January 26, 2024.

2 The deadline for Plaintiff to file a notice of appeal, currently set for January 12, 2024, shall
3 be extended by 30 days to February 11, 2024.

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5 **IT IS SO STIPULATED.**

6 Dated: December 19, 2023

BYRON RAPHAEL LLP

8 By: /s/ Jordan Raphael
9 JORDAN RAPHAEL
10 Attorneys for Defendant
Igloo Products Corporation


11 Dated: December 19, 2023

SANDERS ROBERTS LLP

12 By: /s/ Felton Newell
13 FELTON NEWELL, ESQ.
14 Attorneys for Plaintiff
Vericool World LLC

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16 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

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18 DATED: 12/20/2023

19 
20 Hon. Haywood S. Gilliam, Jr.
21 United States District Judge
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